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VIA ECF

Hon. Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Trevor Milton*, 1:21 CR 478 (ER)

Dear Judge Ramos:

This letter is respectfully submitted in response to the Judgment In A Criminal Case [ECF 327] entered yesterday in the above captioned matter. Entry of the Judgment came as a surprise to us, as we understood the Court to be considering our legal objections to the government's proposed forfeiture order, which we set out in our December 28, 2023 letter to the Court [ECF 320]. The Court endorsed our letter on January 11, 2024, and ordered the government to respond by today, January 18, 2024 [ECF 326]. Consequently, we expected that judgment would not be entered until the parties' arguments regarding forfeiture were resolved.

Should this be the Court's final judgment as to the forfeiture issue, Mr. Milton respectfully renews his request that the forfeiture execution be stayed pending appeal pursuant to Fed. R. Crim. P. 32.2(d). Mr. Milton further requests that all other financial aspects of the sentence, including the fine and any interest thereon, be stayed pending appeal, save for the special assessments that he already paid. *See* Fed. R. Crim. P. 38.

Respectfully submitted,

/s/ Torrey K. Young
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